

## REMARKS

In view of the above amendments and following remarks, reconsideration and further examination are requested.

In the Office Action mailed February 7, 2006: claims 1, 10-15 and 22-34 were rejected under 35 U.S.C. § 103(a) as being unpatentable over EP '387 in view of Kojima et al.; and claims 1, 10-15 and 22-34 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Katsuoka et al. in view of Kojima et al.

In order to discuss these rejections a personal interview was conducted with Examiner MacArthur on March 8, 2006. The courtesies extended by Examiner MacArthur in granting and conducting this interview are greatly appreciated.

During this interview, Applicants' undersigned representative explained that the claimed invention corresponds to the embodiment as discussed in paragraph [0065] on page 17 of the specification. Examiner MacArthur then expressed her basic position in maintaining the rejection of independent claim 1. Specifically, Examiner MacArthur explained that one having ordinary skill in the art would have found it obvious to shut down one of cleaning units 8a or 8b in EP '387 for maintenance or repair, without shutting down any other unit, whereby each workpiece that is cleaned in either of cleaning units 7a and 7b would then be treated in the other one of cleaning units 8a and 8b. Accordingly, this other one of cleaning units 8a and 8b would then function as a "common" cleaning unit as required by claim 1. A similar situation would exist with regard to Katsuoka et al.

Also during the interview was discussed the reason why two cleaning units are used with a common cleaning unit. Specifically, primarily cleaning a first substrate in a first of the two cleaning units is performed for a time period that is greater than a time period for which the first substrate is secondarily cleaned in the common cleaning unit. Similarly, primarily cleaning a second substrate in a second of the two cleaning units is performed for a time period that is greater than the time period for which the second substrate is secondarily cleaned in the common cleaning unit. Thus, because of the cleaning in the two cleaning units taking longer than cleaning

in the common cleaning unit, a single common cleaning unit can be employed without hindering a flow of substrates through these cleaning units. Examiner MacArthur indicated that she would consider this further upon the filing of a response.

Claim 13 recited the feature of the cleaning in the two cleaning units taking longer than the cleaning in the common cleaning unit, and accordingly, the subject matter of claim 13 has been incorporated into claim 1, whereby claim 1 now provides a nexus between using two cleaning units and one common cleaning unit.

EP '387 and Katsuoka et al. are each silent with regard to relative cleaning times between cleaning units. Similarly, Kojima et al. includes no discussion of such cleaning times.

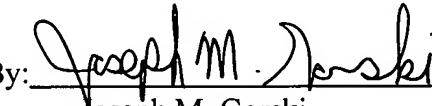
Accordingly, it is respectfully submitted that any combination of the relied upon references would not result in the invention as recited in amended claim 1, whereby claim 1 and its dependent claims are allowable.

In view of the above amendments and remarks, it is respectfully submitted that the present application is in condition for allowance and an early Notice of Allowance is earnestly solicited.

If after reviewing this Amendment, the Examiner believes that any issues remain which must be resolved before the application can be passed to issue, the Examiner is invited to contact the Applicants' undersigned representative by telephone to resolve such issues.

Respectfully submitted,

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